

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 05-11576-DPW

PARTNERS HEALTHCARE
SYSTEM, INC.,

Defendant.

**DEFENDANT PARTNERS HEALTHCARE SYSTEM, INC.'S MOTION FOR
EXTENSION OF TIME TO RESPOND TO DISCOVERY REQUESTS**

Partners Healthcare System, Inc. ("Partners") hereby submits this motion for extension of time to respond to Requests for the Production of Documents, Interrogatories, and Requests for Admission served by Plaintiff on October 11, 2005. Given the importance of this matter and the amount of work required to fully respond to the discovery requests, Partners reasonably seeks an additional 30 days in which to respond to Defendant's discovery requests. After consultation with Plaintiff, Plaintiff has consented to extend the deadline by two weeks. The parties have filed a stipulation to that effect, extending the deadline from November 14, 2005 to November 28, 2005.

Because Partners seeks a full 30 additional days, it files the present motion. Granting this extension will not prejudice the Plaintiff, as the first phase of discovery does not close until March 31, 2006. Partners therefore requests an extension of the stipulated discovery deadline from November 28, 2005 to December 15, 2005.

Dated: November 14, 2005

/s/ Joseph H. Selby
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Attorneys for Partners Healthcare System, Inc.

CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), counsel for Partners Healthcare System, Inc. certifies that they have conferred with Plaintiff and attempted in good faith to resolve this issue.

WDC99 1160530-1.057158.0039

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PARTNERS HEALTHCARE
SYSTEM, INC.,

Defendant.

**ORDER GRANTING DEFENDANT'S MOTION FOR
EXTENSION OF TIME TO RESPOND TO DISCOVERY REQUESTS**

Pending before the Court is Partners Healthcare System, Inc.'s motion to extend the deadline for the its response to Plaintiff's October 11, 2005 discovery. Due notice having been given, all parties having been represented by counsel, the Court having considered the memoranda submitted by the parties, and the Court being fully advised,

It is hereby ORDERED that Defendant's motion be GRANTED and that the deadline for Partners Healthcare System, Inc.'s responses be extended from the stipulated discovery deadline of November 28, 2005 to December 15, 2005.

So ORDERED this _____ day of November, 2005.

JUDGE DOUGLAS P. WOODLOCK
UNITED STATES DISTRICT COURT JUDGE